

Applicant : Ted Alspach  
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Filed : December 6, 2001  
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Attorney's Docket No.: 07844-514001 / P476

### REMARKS

Claims 29, 31, 33-36, 48, 50, 52-55, and 67-71 are pending, with claims 29, 48, 68, and 71 being independent. Claims 30, 32, 37-47, 49, 51, and 56-66 are canceled without prejudice. Claims 29, 31, 33-36, 48, 50, and 52-55 are amended. Claims 67-71 are new. No new matter has been added. Reconsideration and allowance of the pending claims are respectfully requested in light of the following remarks.

Claims 29-36 and 48-55 stand rejected for alleged lack of enablement under 35 U.S.C. §112, first paragraph.

Claims 29-36 and 48-55 stand rejected for allegedly being indefinite under 35 U.S.C. §112, second paragraph.

Claims 29-66 stand rejected under 35 U.S.C. §102(a) as allegedly being anticipated by Knoll Light Factory ("Knoll Software"), reviewed by Andre Balis ("Balis").

Claims 29-66 stand rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Maya software user manual section Optical Light Effects ("Maya OLE").

The rejection of claims 30, 32, 37-47, 49, 51, and 56-66 is moot in light of their cancellation.

#### **I. Claims rejected under 35 U.S.C. § 112**

##### **A. Claims 29-36 and 48-55 are rejected under 35 U.S.C. § 112, first paragraph.**

The examiner asserted that the specification, "while being enabling for a modeled flare, does not reasonably provide enablement for a 'model.'"

The applicant disagrees, but to expedite prosecution the rejected claims have been amended. As such, the rejection of claims 29, 31, 33-36, 48, 50, and 52-55 should be withdrawn.

##### **B. Claims 29-36 and 48-55 are rejected under 35 U.S.C. § 112, second paragraph.**

The examiner asserted that the "meaning of 'model,' in the context of the claims is unknown. The specification provides no further understanding. A model of what?"

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The applicant disagrees, but to expedite prosecution the rejected claims have been amended. As such, the rejection of claims 29, 31, 33-36, 48, 50, and 52-55 should be withdrawn.

## **II. Claims rejected under 35 U.S.C. § 102**

### ***A. Claims 29-66 stand rejected as anticipated by Balis.***

Claim 29 recites a computer-implemented method for presenting a plurality of visually rendered shapes, where each one of the visually rendered shapes has a geometric correspondence with a lens flare component. A first user input is received to manipulate a first visually rendered shape in the plurality of visually rendered shapes, to interactively change the position or form of a first corresponding lens flare component. A visual rendering of the first corresponding lens flare component is presented, where the visual rendering reflects the change in the position or form of the first corresponding lens flare component.

Balis is a review of the software package Knoll Software. This software is a visual effects package allowing film editors to modify video footage by adding computer-generated lens flare effects. These lens flares spice up bland video footage, see page 1.

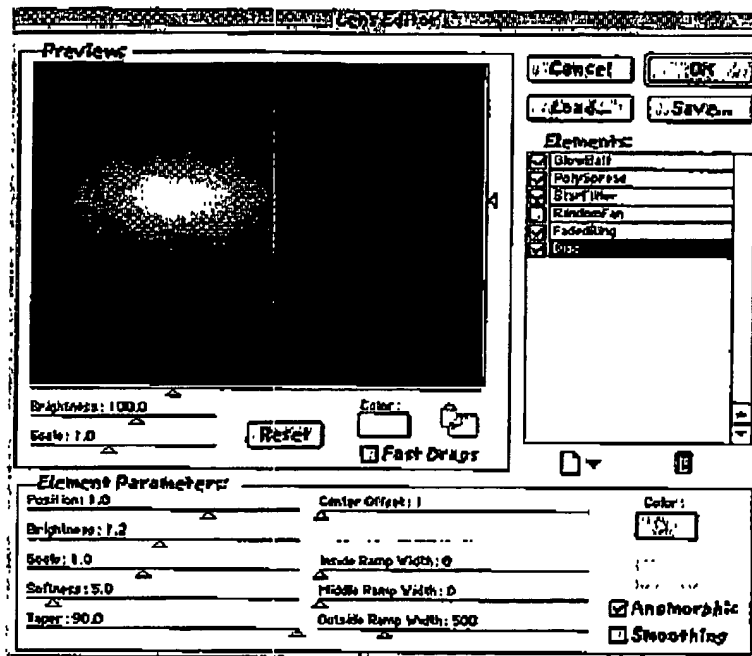
Claim 29 recites manipulating "visually rendered shapes" to "interactively change" the position or form of the associated lens flare component. The examiner asserts that "[Balis] discloses vector based interactive software for creating various lens flares." The applicant respectfully submits that this is insufficient, even if true. Balis does not meet the various claim limitations.

Balis includes a screenshot showing how Knoll Software receives user input through a dialog box. For the convenience of the examiner it is reproduced here:

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The examiner can see for himself that in Knoll Software user input manipulates lens flare components through the textually labeled sliders.

Claim 29 recites user input directly manipulating a “visually rendered shape” “having a geometric correspondence with” a lens flare component. However, even if the sliders in Knoll Software were deemed to be “visually rendered shapes,” they do not have a geometric correspondence with the lens flare components. At best they have a semantic correspondence with lens flare properties, not a geometric correspondence with lens flare components.

Claim 29 recites manipulating shapes to interactively change the position or form of a corresponding lens flare component. Knoll Software, by contrast, discloses a two-step process for changing flare properties. After the user adjusts Knoll Software’s textually labeled sliders, the user must confirm his changes to the flare properties by clicking OK.

Claim 29 recites that a lens flare component can be a “flare ring,” “flare ray,” or a “halo.” Again, none of these words appear in Balis. The applicant does not know if Knoll Software teaches these limitations. What is certain is that Balis, the reference cited by the examiner, does not teach them.

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Balis therefore does not anticipate claim 29 or claims 48, 68, or 71, which have similar limitations to claim 29. For at least this reason, the rejection over Balis of claims 29 and 48, as well as their dependent claims, should be withdrawn.

Maya OLE discloses high-end 3D graphics modeling software called Maya. This advanced graphics package is used to model and render computer graphics. One feature of Maya is that it can render lens flares in finished images, to trick the viewer into believing that the computer-generated image was filmed with a real camera, see Maya OLE, page 1. There are two phases in modeling with Maya. In the first stage, the user interactively manipulates crude representations of his model, with icons etc., see Maya OLE, page 11. In the second stage, the Maya software renders a high-quality finished image which cannot be directly modified. The cited reference Maya OLE is one part of a multipart manual for the Maya software, and other parts will be cited in these remarks to more fully illuminate the issues.

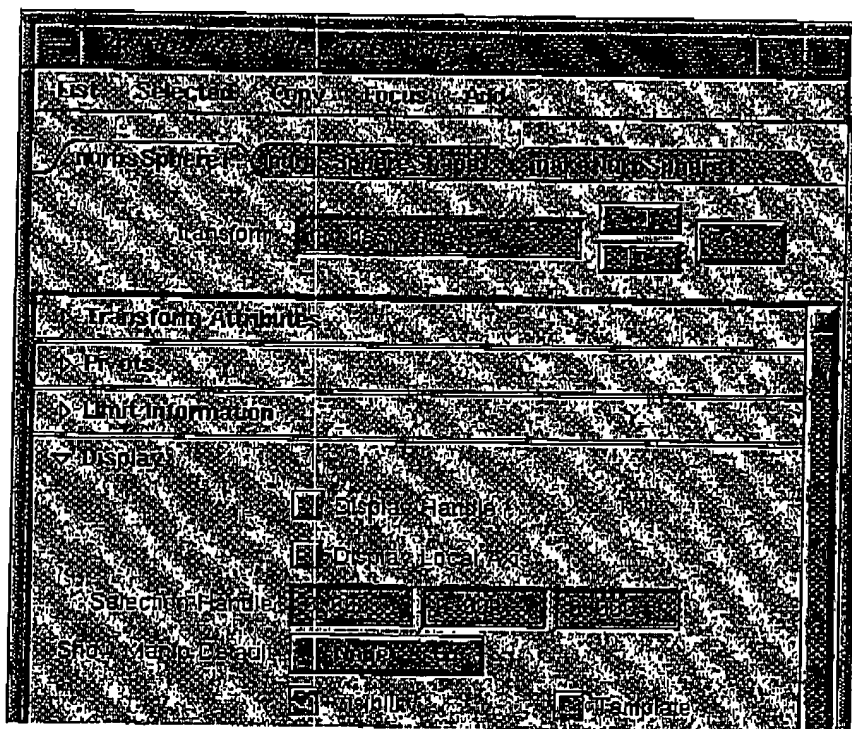
Claim 29 recites manipulating "visually rendered shapes" to "interactively change" the position or form of the associated lens flare component. The examiner asserts that the claim is "clearly anticipated by [Maya OLE]." The applicant disagrees. None of these features of Maya anticipate claim 29: the dialog box ("attribute editor"), the lens flare icon which can be dragged, or the final rendered image.

Many characteristics of lens flares, such as radius, color, the number of rays, etc. are set by modifying "attributes," see Maya OLE pages 8-10. Attributes are modified using an "attribute editor" which is a kind of dialog box where numbers are entered using the keyboard and checkboxes are clicked. An example of an attribute editor has been reproduced here so that the examiner can see this for himself. The attribute editor reproduced here functions similarly to a light or light effect attribute editor, although the one reproduced here is for another kind of object in Maya.

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The examiner can see for himself that in Maya, user input manipulates lens flare components through buttons, checkboxes, and entering numbers with the keyboard.

Claim 29 requires user input manipulating a "visually rendered shape" "having a geometric correspondence with" a lens flare component. However even if the buttons, checkboxes, and text-fields in Maya were deemed to be "visually rendered shapes," they do not have a geometric correspondence with the lens flare components. At best they have a semantic correspondence with lens flare properties, not a geometric correspondence with lens flare components.

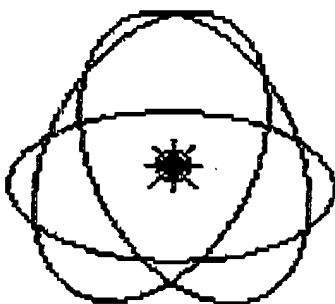
Claim 29 recites manipulating shapes to interactively change the position or form of a corresponding lens flare component. Maya, by contrast, discloses a two-step process for changing flare properties. After the user adjusts Maya's buttons, checkboxes, and text-fields, the user must render the image to see his changes.

Only one property of lens flares can be changed in Maya through direct manipulation, and that is the position of the light effect, see Maya Light, page 9. An icon represents the

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position of the lens flare, see Maya OLE, page 11. It can be dragged around to change the lens flare's position. The icon is reproduced below for the examiner's convenience.



Optical Light Effect Icon

Claim 29 recites a "plurality of visually rendered shapes." But Maya only discloses a *single* indivisible icon which can be dragged to change the lens flare's position.

Claim 29 recites manipulating "visually rendered shapes" to interactively change the position or form of the associated lens flare component. The recited visually rendered shapes geometrically correspond with lens flare components. But Maya only discloses an icon, which is unchanging and indivisible. The icon is associated with the lens flare as a whole. The icon is not composed of individual visually rendered shapes which geometrically correspond to lens flare components.

Finally, a lens flare in a finished 3D image is not the claimed limitation of a plurality of visually rendered shapes. When Maya makes a 3D image, that image itself cannot be manipulated by user input. Therefore, the limitation of "receiving user input to directly manipulate a first visually rendered shape" is not found in Maya.

Maya OLE therefore does not anticipate claim 29 or claims 48, 68, or 71, which have similar limitations to claim 29. For at least this reason, the rejection over Maya OLE of claims 29 and 48, as well as their dependent claims, should be withdrawn.

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### Conclusion

For at least these reasons, the applicant respectfully submits that claims 29, 48, 68, and 71, as well as their dependent claims, are in condition for allowance. By responding in the foregoing remarks only to particular positions taken by the examiner, the applicant does not acquiesce with other positions that have not been explicitly addressed. In addition, the applicant's arguments for the patentability of a claim should not be understood as implying that no other reasons for the patentability of that claim exist.

Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: 5/1/06

  
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